

EXHIBIT 14

NETWORK DEPOSITION SERVICES
Transcript of Lee Soltysiak 30 (b) (6)

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3 - - -
4 DONALD J. TRUMP FOR)
PRESIDENT, INC., et al.,)
5)
Plaintiffs,)
6)
vs.) No.
7) 2:20-cv-966-RN
KATHY BOOCKVAR, et al.,)
8)
Defendants.)

Videotape Video Conference 30(b)(6) Deposition of
MONTGOMERY COUNTY BOARD OF ELECTIONS
LEE SOLTYSIAK, Designated Deponent

Tuesday, September 29, 2020

14 The videotape video conference deposition of LEE
15 SOLTYSIAK, called as a witness by the plaintiffs,
16 pursuant to notice and the Federal Rules of Civil
17 Procedure pertaining to the taking of depositions,
18 taken before me, the undersigned, Lance E. Hannaford,
19 Notary Public in and for the Commonwealth of
20 Pennsylvania, at 2568 Aldon Drive, Sewickley,
21 Pennsylvania 15143, commencing at 3:37 o'clock p.m.,
22 the day and date above set forth.

20 NETWORK DEPOSITION SERVICES
21 SUITE 1101, GULF TOWER
22 PITTSBURGH, PENNSYLVANIA
866-565-1929

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1 Pennsylvania election code?

2 A Yes. It is.

3 Q Now, periodically the Pennsylvania
4 Department of State may provide assistance or guidance
5 or instructions to the counties for state and federal
6 elections. Are you aware of that?

7 A I am.

8 Q And I want to ask some questions about
9 Montgomery County, in general. How many voting
10 precincts are in Montgomery County?

11 A 426.

12 Q How many registered voters are there?

13 A Approximately, 575,000.

14 Q How many polling locations for in-person
15 voting will Montgomery County have open for this
16 upcoming general election?

17 A I expect approximately 291 locations. That
18 list is being still finalized.

19 Q And will some of those locations include
20 more than one polling station?

21 A They will.

22 Q In addition to those 291 locations, does
23 Montgomery County intend to use any satellite election
24 offices for in-person voting?

25 A Yes. We do.

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1 Q And how many?

2 A Four. Four locations.

3 Q Will those be locations that are located in
4 some sort of county building or county leased
5 building?

6 A Yes.

7 Q Who will staff those locations?

8 A County staff.

9 Q Will that county staff be employees of the
10 county election board?

11 A I can't -- I don't know for sure. In most
12 cases, yes. But we are still finalizing the staffing
13 plan, as well as the hours for those locations.

14 Q When or what is the target date by which
15 Montgomery County intends to have the final plans for
16 those locations in place?

17 A We expect we will have the hours confirmed
18 this week. And we will continue to work on the
19 staffing plan and policies and training in the coming
20 days.

21 Q Is that information, with respect to the
22 location and the hours, going to be publicized to the
23 voters of Montgomery County in some way?

24 A They will be.

25 Q How do you intend to do that?

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1 already processed and accepted, there are
2 approximately 20,000 that we are in the process of
3 reviewing and accepting or rejecting.

4 Q Do you know how many applications were
5 rejected so far?

6 A I do not.

7 Q Do you know any of the basis for the
8 rejection of any of the applications?

9 A I do not.

10 Q Do you know who would know that
11 information?

12 A I would check with our counsel on that. Or
13 the director of voter services.

14 Q Did Montgomery County send applications to
15 every eligible voter?

16 A We did not.

17 Q You mentioned the use of drop boxes
18 earlier. Does Montgomery County plan to use drop
19 boxes in the upcoming general election?

20 A We do.

21 Q How many drop boxes?

22 A We have established 10 sites officially by
23 the election board. And I anticipate one more to be
24 confirmed later this week. For a total of 11.

25 Q And will those drop boxes be put in a

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1 the deadline, I should say.

2 Q I just want to focus on the eligibility
3 effort as it relates to the deadline.

4 Are you saying that was the process that
5 was used by Montgomery County previously?

6 A That is the process we followed in the
7 primary.

8 Q And do you intend to follow the same
9 process in the general election?

10 A We do.

11 Q Early on, when we started talking, you
12 mentioned that there are going to be four additional,
13 I guess, satellite locations where people can return
14 their ballots in addition to the drop boxes. Is that
15 right?

16 A That's correct.

17 Q And will the staff that is manning those
18 locations be required to ask voters if it is their own
19 ballot that they are casting?

20 A I don't know that they would explicitly say
21 that. They have to provide all of the required forms
22 of identification to apply for an absentee ballot;
23 driver's license, and the other information that it
24 requires. So once they provide that, they would be --
25 that is the only guidance they would be giving them.